Kathy:

I did speak with Gary Kimball last Friday, and he got back to me this
afternoon after talking to the MPCA staff member who did the actual
calculations for Fond du Lac. According to Gary, the criteria for our
standards were calculated according to the methodology and equations in
the GLI guidance, p. 15409 (human cancer and noncancer values). Our
values for PCBs are virtually half those of the state's (some rounding
error, perhaps?), reflecting our doubling of the fish consumption rate,
and Gary indicated that MPCA's values were in accordance with the latest
EPA thinking. Our toxaphene values were also virtually half the state's
for comparable class waters. The reason our trichloroethylene value
isn't different simply by a factor of two is that the bioaccumulation
factor is smaller for the non-drinking water classes, and the fish
consumption factor doesn't weigh as heavily in the equation as the
drinking water element. So, whereas most of our numbers end up being
half the criteria of the state's, there are those few instances where
the relative importance of the drinking water factors are higher than
the BAFs. Does this make sense? I followed what Gary was explaining to
me, but if it isn't clear, why don't you call Dan White directly at
(651-296-7237); he's the MPCA guy who did the calculations for us.

As far as the two missing values in the metals conversion table, Gary
indicated that Minnesota would probably go ahead and shift those acute
factors for mercury and silver to apply for the chronic as well, in
their current round of rule changes. I don't see why Fond du Lac
couldn't do the same right now, with our first version.

If you think you & Dave can get our standards moving through channels
with the information I've sent, that would be great. Let me know if
there's anything else that needs to be cleared up; otherwise, I'll wait
to hear from you about our progress.

Thanks - Nancy